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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP  
LEED ENVIRONMENTAL, INC.**

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November 10, 1999

**Telecopy and First Class Mail**

Mr. Brad Bradley  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois  
Consent Decree  
Voluntary Progress Report 6 (October 1999)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during October 1999.

**1. Actions Taken During Previous Month to Comply with the Consent Decree:**

- During October 1999, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities related to remediation of residential lots and remote fill areas. Major tasks performed by ENTACT included soil sampling and analysis activities and remediation of 33 residential lots and 2 remote fill lots. The residential lots and remote fill lots which were remediated in October 1999 are summarized on Table 1 and Table 2, respectively. Through October 1999, ENTACT has completed remedial activities at 700 residential properties and 22 remote fill properties.
- During October 1999, ENTACT also continued with efforts related to remediation of the Taracorp pile. Major tasks performed by ENTACT included: (1) continuation of backfill of screened residential soils on the industrial site; (2) continuation of the placement of the topsoil cover on the Taracorp pile; (3) planning activities for seeding and turf reinforcement activities on the cover of the Taracorp pile; (4) site surveying; and (5) related activities.



- On October 1, 1999, representatives of EPA, ARCADIS Geraghty & Miller ("ARCADIS"), and the Group's Technical Committee met by conference call to discuss EPA's September 20, 1999 draft comments regarding the proposed groundwater monitoring well locations and the proposed approach for the pre-design field investigation for groundwater.
- On October 5, 1999, the Group's project coordinator issued a voluntary progress report to EPA.
- On October 5, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on October 8, 1999 to document the results of the meeting.
- On October 8, 1999, representatives of EPA, ARCADIS, and the Group's Technical Committee met by conference call to continue discussions regarding the proposed scope of work for the pre-design field investigation for groundwater.
- On October 20, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on October 29, 1999 to document the results of the meeting.
- On October 25, 1999, the Group's project coordinator received EPA's approval of the Pre-Design Investigation Work Plan for Groundwater and EPA's comments on the document.
- During October 1999, ARCADIS personnel continued project planning efforts associated with the implementation of the pre-design investigation for groundwater. The Group initiated efforts to secure access to properties for installation of groundwater monitoring wells.

## **2. Summary of Data and/or Results of Sampling and Tests Received:**

- Data from soil sampling activities performed by ENTACT during October 1999 in residential lots and remote fill areas have previously been provided by ENTACT personnel to EPA and have been used as the basis for defining soil excavation depths.

- Data collected from monitoring performed at the industrial site are maintained by ENTACT personnel and are available for inspection by EPA and ACOE personnel at the site.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- Not applicable for this reporting period.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- ARCADIS personnel will continue to prepare for field activities associated with the pre-design investigation for groundwater and will initiate efforts to address EPA's comments on the Pre-Design Investigation Work Plan for Groundwater. The Group will continue efforts to secure access to appropriate properties for installation of monitoring wells. The Group will advise EPA at a later date with a schedule for initiation of the pre-design investigation for groundwater.
- During November 1999, ENTACT will continue soil sampling activities and soil excavation and restoration of residential lots and remote fill lots. Residential and remote fill lots to be addressed by ENTACT personnel during November 1999 will be coordinated on a daily basis with ACOE representatives and will be discussed with EPA during weekly progress meetings. ENTACT anticipates that remedial activities associated with the residential lot and remote fill lot remediation will be substantially complete in late November - December 1999. ENTACT anticipates that the paving of alleys in Venice Township will be completed in November 1999. ENTACT also plans to define the scope of work at Slough Road, in consultation with EPA, as soon as possible.
- During November 1999, ENTACT will also continue activities associated with remediation of the Taracorp pile. Activities to be performed by ENTACT personnel during October 1999 are expected to include: (1) continued backfill of excavated industrial areas; (2) completion of the placement of the topsoil layer on the Taracorp pile; (3) seeding of the topsoil layer and placement of erosion control mat on the Taracorp pile; (4) installation of the concrete channels; (5) installation of the storm water sewer system; and (6) related activities. Weather permitting, ENTACT anticipates that remedial activities associated with the Taracorp pile will be substantially complete by the end of November 1999, with backfill of excavated areas and other miscellaneous tasks continuing into December 1999.

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5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- During October 1999, Group representatives and ENTACT personnel learned of several potential issues with the adjacent property owners at the State Street Warehouse and the Rich Oil Company. Representatives of the Group and ENTACT initiated efforts with the property owners to resolve these issues.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

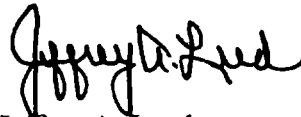
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed  
Project Coordinator

attachment

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)  
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)  
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller (w/attachment, by first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group  
(w/attachment, by first class mail)

**TABLE 1**  
**RESIDENTIAL LOTS**

**Progress Report - Activities Through 10/15/99**

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone	Sod
669	823	Washington	3	2 lots	10/1/99	10/4/99	10/4/99	10/7/99
670	2425	State	3		10/4/99	10/12/99	10/12/99	st10/15
671	2135	Dewey	6		10/4/99	10/7/99	10/7/99	10/11/99
672	2245	Delmar	6		10/5/99	10/12/99	10/12/99	10/14/99
673	2233	Iowa	6		10/6/99	10/12/99	10/12/99	10/14/99
677	2010	13th	12	4 lots	10/6/99	10/14/99	10/14/99	
678	2233	Delmar	12		10/6/99	10/12/99	10/12/99	10/14/99
679	1207	Edwardsville	3		10/6/99	10/13/99	10/13/99	10/14/99
685	1010	State	12	6 lots	10/11/99	10/20/99	10/20/99	
686	1013	Greenwood	3		10/13/99	10/15/99	10/15/99	
687	921	Lee	3		10/14/99	10/14/99	10/14/99	10/21/99
689	1116	Iowa	12	2 lots	10/15/99	10/18/99	10/18/99	

**Progress Report - Activities Through 10/31/99**

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone
690	1918	Rhodes	6		10/18/99	10/19/99	10/19/99
691	1416	Washington	6		10/19/99	10/19/99	10/19/99
695	2224	Bryan	3	4 lots	10/22/99	10/25/99	10/25/99
696	1348	Madison	12		10/22/99	10/26/99	10/26/99
697	2229	Illinois	3		10/25/99	10/28/99	10/28/99
698	2220	Ohio	3		10/26/99	10/28/99	10/28/99
699	2211	Dewey	3		10/28/99	10/29/99	10/29/99
700	2220	Dewey	6		10/28/99	10/29/99	10/29/99

**TABLE 2**  
**REMOTE FILL LOTS**

Progress Report - Activities Through 10/31/99

	Lot # Street	Soil Removal	Backfill	Stone
21	214 Hill	10/29/1999	11/1/1999	11/1/1999
22	216 Hill	10/29/1999	10/29/1999	10/29/1999